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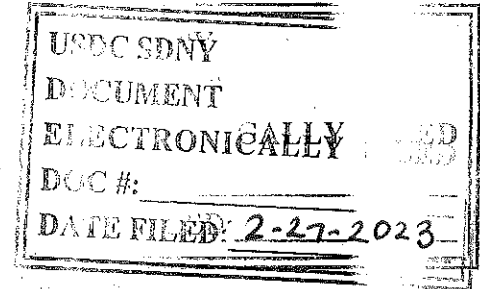
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February 26, 2023

VIA CM/ECF

Honorable Lewis A. Kaplan, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007



Re: *Cerveceria Modelo de México, S. de R.L. de C.V., et al. v. CB Brand Strategies, LLC, et al.*, Case No. 1:21 Civ. 01317-LAK (S.D.N.Y.)

Dear Judge Kaplan:

We represent Defendants CB Brand Strategies, LLC, Crown Imports LLC, and Compañia Cervecera de Coahuila, S. de R.L. de C.V. ("Defendants") in the above-captioned action. In accordance with Your Honor's Individual Rules of Practice, we write to respectfully request authorization to seal/redact portions of Defendants' forthcoming letter (the "Letter"), which will be filed Sunday, February 26, 2023 in accordance with the Court's December 19, 2022 Order (ECF No. 263). The Letter makes reference to highly sensitive personal information as contemplated by Your Honor's Individual Rules of Practice.

While there is a presumption of public access to judicial documents, courts have "considerable discretion in determining whether good cause exists to overcome the presumption of open access to documents." *Geller v. Branich Int'l Realty Corp.*, 212 F.3d 734, 738 (2d Cir. 2000). In exercising such discretion, courts must balance various factors, including "the competing interests of public access against the privacy interests of the parties." *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 119 (2d Cir. 2006); *see also* Fed. R. Civ. P. 26. Courts routinely grant requests to seal where the presumption of public access is outweighed by the privacy interests of the parties. *Lugosch*, 435 F.3d at 119. Under these circumstances, the balancing test weighs in favor of sealing/redacting confidential portions of the Letter.

Pursuant to Your Honor's Individual Rules of Practice, we will file the Letter under seal. Defendants also respectfully request the Court's permission to file public versions of the Letter within 7 days of the under-seal filing.

KIRKLAND & ELLIS LLP

Honorable Lewis A. Kaplan, U.S.D.J.
February 26, 2023
Page 2

We thank the Court for its consideration of this matter.

Respectfully submitted,

/s/ Sandra C. Goldstein

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